



1028582

Author: PATRICIA SMITH at R8CCPO4  
Date: 12/5/96 11:09 AM  
Priority: Urgent  
TO: LISA REED at R8CCPO3  
Subject: Re: CO VCUP application at CERCLA site

*Bassy-L-  
NP caliber*

## ----- Message Contents -----

Mark gave me a heads up on this already. I already had it noted as "VCP in progress" on my personal list of active CERCLIS sites. If I remember correctly, he was a little concerned that they might get steamrollered on some of these applications, so you hit the mark when you are specific about stating our goals. Without advertizing scores, we can focus on the risk management drivers. The applicant should demonstrate that there will be no exposures to environmental receptors via surface water . . . have they tested for releases to the surface water pathway? If there are hits, have they delineated the sensitive receptors downgradient (wetlands, wildlife refuges, T&E species, etc.) and tested the reasonably near ones?

For groundwater, we probably wouldn't concentrate on the BTEX as a listing factor, unless we had reason to believe they weren't petroleum exempt. TCA and chromium are below MCLs. I don't recall the MCLs for the other inorganics offhand. How close are we to Scott's Liquid Gold, at about 49th and Havana? (Scott's is a circa late 1980's VCP via CDH RCRA (pre-me), and the newspaper clippings indicate this was a big communication mess between EPA Superfund and the State RCRA.) Scotts just settled with the Army this quarter for TCA contamination flowing NW across Stapleton Airport Runways onto the Rocky Mountain Arsenal, and they may one day look farther upgradient to find others to share their cost. The argument was that TCA breaks down into an isomer of DCE which has an MCL of 7ppb. We have found chlorinated hydrocarbons to be very mobile in this part of town, on the order of miles. Mark may want to check Robson (1996), USGS HA-736, for potential paleochannel configurations in this area. If the State is not diligent about safeguarding the migration of chlorinated hydrocarbons over here, it could come back to haunt them, and put a big blemish on the program.

## ----- Reply Separator -----

Subject: CO VCUP application at CERCLA site  
Author: LISA REED at R8CCPO3  
Date: 12/3/96 4:32 PM

The state has received an application for Silver Engineering which is a CERCLA site. Per the MOU we need to decide whether or not to suspend activities at the site. If we do decided to suspend activities at the site and the company "implements the cleanup plan completely and to the satisfaction of CDPHE, EPA shall remove the site from its CERCLIS database."

Please read the following and provide your recommendation - suspend activities or not. Be as specific as possible on reasons or qualifiers for either choice. Also, who should sign the letter to the state? (I signed the letter on Rico but this is a site management decision so maybe the signature should be Doug and/or Dale.) Also, any ideas how to handle conflicting responses and documenting response manager decisions such as this are welcome.

The state would like a response within about a week time frame. I am out next week so IF I am taking the lead, I need to get a response to the state by Friday or tell the state it will be the 16th or 17th. (Mark did not seem to like that idea.)

I did a quick review of PA report and discussed the proposed VCUP with Mark Walker and CDPHE. Here is what I know about the site:

Location- Aurora, near Sable and Smith Rd.

Status - PA completed in 1993; still active; I do not know if further SA activities are planned (Pat's out sick today)

Brief Background - Operations began in 1982. Current facility manufactures machinery for the sugar and wood pulp industries; activities involve a large amount of welding and metal cutting; claims of on site dumping of hazardous waste and falsifying shipping records were made by a former employee; small quantity generator under RCRA; current owner purchased the company in 1989. Manufacture processes includes blasting manufactured metal products with aluminum oxide and then painting them on site; it appears there are no records of how waste oil or hazardous waste prior to 1992 was disposed.

Potential contaminants - barium, benzene, methyl ethyl ketone (MEK), toluene, sand from sandblasting.

Known contamination in groundwater (from VCUP application) - Results from geoprobe sampling - benzene 160ppb; toluene 19ppb; 1,1, TCA 63ppb; dissolved metals include - arsenic 14ppb; silver 14ppb; chromium 29ppb; mercury 1ppb.

Proposed action - company has supposedly removed contaminated soils and wants to conduct ground water monitoring for 2 years to show biodegradation.

Initial state response - Mark said his initial reaction is that he would like to see more specific groundwater monitoring goals, such as clean areas on site. I asked whether the state would make the company meet MCLs (5ppb for benzene) before the cleanup would be considered complete. Mark said they have approved VCUP actions where MCLs were exceeded at the property boundary (he did not sound happy with this decision but it did sound like unique situation).

Other- confidential prescore sheet indicates that hits to environmental targets could score the site above 28.5. Also groundwater contamination more than a quarter mile could score site. Ambient air pathway score would depend on concentrations and release direct into air.

My initial reaction - It does not sound like this site would be a high priority within our list of potential sites. It might be possible to say we will suspend activities with a qualifier. Mark suggested saying as long as the state is comfortable with the risk levels after cleanup, EPA suspends activities. I think we could be more specific: As long as certain levels (MCLs?) are met at final cleanup, EPA will suspend activities. Mark could then tell the company that in order to approve the application and get agreement from EPA to suspend activities the company will need to do x,y,z and submit a revised application.